

MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900
Gary S. Lee
Lorenzo Marinuzzi
Norman S. Rosenbaum

*Counsel for The Post-Effective Date
Debtors, The ResCap Liquidating Trust
and The ResCap Borrower Claims Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Case No. 12-12020 (MG)
)
RESIDENTIAL CAPITAL, LLC, et al.,) Chapter 11
)
Debtors.) Jointly Administered
)

**PROPOSED AGENDA FOR MATTERS SCHEDULED
TO BE HEARD ON FEBRUARY 20, 2014 AT 10:00 A.M. (EST)**

Location of Hearing: United States Bankruptcy Court for the Southern District of New York,
Alexander Hamilton U.S. Custom House, Courtroom 501, One Bowling Green, New York, NY
10004-1408

I. ADJOURNED MATTER(S)

1. Derrius Silmon's Motion for Relief from Stay [Docket No. 3585]

Related Document(s):

- a. Notice of Hearing on Motion for Relief from Stay [Docket No. 5084]
- b. Notice of Adjournment of Hearing on Derrius Silmon's Motion for Relief from Stay to November 7, 2013 at 2:00 p.m. (Prevailing Eastern Time) [Docket No. 5223]
- c. Notice of Adjournment of Hearing on Motion of Derrius Silmon for Relief from Stay to December 17, 2013 at 10:00 a.m. [Docket No. 5627]

- d. Notice of Adjournment of Hearing on Motion of Derrius Silmon for Relief from Stay to January 9, 2014 at 10:00 a.m. [Docket No. 6051]
- e. Notice of Adjournment of Hearing on Motion of Derrius Silmon for Relief from Stay to January 30, 2014 at 10:00 a.m. [Docket No. 6214]
- f. Notice of Adjournment of Hearing on Motion of Derrius Silmon for Relief from Stay to February 20, 2014 at 10:00 a.m. [Docket No. 6346]
- g. Notice of Adjournment of Hearing on Motion of Derrius Silmon for Relief from Stay to March 26, 2014 at 10:00 a.m. [Docket No. 6478]

Response(s): None.

Status: The hearing on this matter has been adjourned to March 26, 2014.

2. Motion of Simona Robinson for Relief from Stay [Docket No. 4948]

Related Document(s):

- a. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay [Docket No. 5063]
- b. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to December 17, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5311]
- c. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to January 9, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6081]
- d. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to February 6, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6324]
- e. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to February 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6403]
- f. Notice of Adjournment of Hearing on Motion of Simona Robinson for Relief from Stay to March 11, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6492]

Response(s):

- a. Debtors' Objection to Motion of Simona Robinson for Relief from Stay [Docket No. 5261]

b. Objection of Ocwen Loan Servicing LLC to Motion of Simona Robinson for Relief from Stay [Docket No. 5262]

Reply:

a. Robinson's Reply to the Opposition of ResCap and Ocwen to Motion for Relief from Automatic Stay [Docket Nos. 5285 and 5304]

Status: The hearing on this matter has been adjourned to March 11, 2014.

3. Motion of Rosalind Alexander-Kasparik for Relief from Stay [Docket No. 5621]

Related Document(s):

a. Notice of Adjournment of Hearing on Motion of Rosalind Alexander-Kasparik for Relief from Stay to January 9, 2014 at 10:00 a.m. [Docket No. 6105]

b. Notice of Adjournment of Hearing on Motion of Rosalind Alexander-Kasparik for Relief from Stay to February 6, 2014 at 10:00 a.m. [Docket No. 6357]

c. Notice of Adjournment of Hearing on Motion of Rosalind Alexander-Kasparik for Relief from Stay to February 20, 2014 at 10:00 a.m. [Docket No. 6431]

d. Notice of Adjournment of Hearing on Motion of Rosalind Alexander-Kasparik for Relief from Stay to March 11, 2014 at 10:00 a.m. [Docket No. 6491]

Response(s):

a. Debtors' Objection to Motion for Relief from Stay Filed on Behalf of Rosalind Alexander-Kasparik [Docket No. 6056]

Status: The hearing on this matter has been adjourned to March 11, 2014.

II. STATUS CONFERENCE(S)

1. Request of Verizon Business Network Services, Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6253]

Related Document(s):

a. Notice of Adjournment of Hearing on Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim to February 6, 2014 at 10:00 A.M. [Docket No. 6381]

- b. Notice of Adjournment of Hearing on Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim to February 20, 2014 at 10:00 a.m. [Docket No. 6434]

Response(s):

- a. Objection of the Liquidating Trust to Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6340]
 - (i) Declaration of Deanna Horst in Support of Objection of The Liquidating Trust to Request of Verizon Business Network Services Inc. for Allowance and Payment of Administrative Expense Claim [Docket No. 6341]

Reply:

- a. Reply of Verizon Business Network Services Inc. In Support Of Request For Allowance And Payment Of Administrative Expense Claim [Docket No. 6372]

Status: A status conference on this matter will be going forward.

III. UNCONTESTED MATTER(S)

- 1. The ResCap Liquidating Trust's Motion for Entry of an Order Authorizing the Liquidating Trust to Enter Into Certain Settlement Agreements [Docket No. 6398]

Related Document(s):

- a. The ResCap Liquidating Trust's Motion to File Under Seal Redacted Portions of Certain Settlement Agreements [Docket No. 6397]
- b. Declaration of Martin Blumentritt in Support of the ResCap Liquidating Trust's Motion for Entry of an Order Authorizing the Liquidating Trust to Enter Into Certain Settlement Agreements [Docket No. 6399]
- c. Certificate of No Objection Regarding The ResCap Liquidating Trust's Motion for Entry of an Order Authorizing the Liquidating Trust to Enter Into Certain Settlement Agreements [Docket No. 6485]
- d. Certificate of No Objection Regarding The ResCap Liquidating Trust's Motion to File Under Seal Redacted Portions of Certain Settlement Agreements [Docket No. 6486]
- e. Order Granting the ResCap Liquidating Trust's Motion to File Under Seal Redacted Portions of Certain Settlement Agreements [Docket No. 6494]

f. Order Approving the ResCap Liquidating Trust's Motion for Entry of an Order Authorizing the Liquidating Trust to Enter Into Certain Settlement Agreements [Docket No. 6495]

Response(s): None.

Status: The order has been filed by the Court. No hearing is required.

IV. CLAIMS OBJECTIONS

1. Debtors' Objection to Amended Proofs of Claim Filed by Certain Plaintiffs in California Litigation [Docket No. 6130]

Related Document(s):

a. Memorandum Opinion and Order Sustaining Debtors' Objections to Proofs of Claim and Amended Proofs of Claim Filed by Certain Plaintiffs in California Litigation [Docket No. 6439]

Response(s): None.

Status: The Court has issued a Memorandum Opinion and Order on this matter. No hearing is required.

2. The ResCap Borrower Claims Trust's Objection to Proofs of Claim Filed by Caren Wilson (Claim Nos. 4754 and 7181) [Docket No. 6268]

Related Document(s):

a. Motion to Seal Confidential Declaration of Attorney Wendy Alison Nora in Support of Motion to Strike Objection Filed by Disqualified Counsel for Trustee as Initial Response of Caren Wilson to Objection to Claim #4754 in the Record of Kurtzman Carlson Consultants, LLC (KCC, LLC) as Amended as Claim 18 and Renumbered by KCC, LLC as Claim #7181 in These Proceedings [Docket No. 6425]

Response(s):

a. Declaration of Attorney Wendy Alison Nora in Support of Motion to Strike Objection Filed by Disqualified Counsel for Trustee as Initial Response of Caren Wilson to Objection to Claim #4754 in the Record of Kurtzman Carlson Consultants, LLC (KCC, LLC) as Amended as Claim 18 and Renumbered by KCC, LLC as Claim #7181 in These Proceedings [Docket No. 6427]

Reply:

- a. The ResCap Borrower Claims Trust's Reply in Support of the ResCap Borrower Claims Trust's Objection to Proofs of Claim Filed by Caren Wilson (Claim Nos. 4754 and 7181) [Docket No. 6493]

Status: The hearing on this matter will be going forward.

- 3. Debtors' Thirtieth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) [Docket No. 4887]

Related Document(s):

- a. Notice of Adjournment of Hearing on Debtors' Thirtieth Omnibus Objection to Claims (No Liability Borrower Claims- Books and Records) Against Gwendell L. Philpot (Claim No. 5067) to December 17, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5467]
- b. Notice of Adjournment of Hearings on Debtors' Twenty-Sixth, Thirtieth, Forty-Second, Forty-Fourth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6107]
- c. Notice of Adjournment of Hearing on Debtors' Thirtieth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6360]
- d. Notice of Adjournment of Hearing on Debtors' Thirtieth and Forty-Ninth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6476]

Response(s):

- a. Gwendell L. Philpot's Opposition to Objection, Expungement and Disallowance of Claim [Docket No. 5233]

Reply:

- a. Debtors' Second Supplemental Omnibus Reply in Support of Debtors' Thirtieth Omnibus Objection to Claims (No Liability Borrower Claims – Books and Records) [Docket No. 6089]

Status: The hearing on this matter, solely as it relates to the claim filed by Gwendell L. Philpot, has been adjourned to March 11, 2014.

- 4. Debtors' Forty-Fourth Omnibus Objection to Claims ((A) Late-Filed Claims; (B) Duplicate Claims; (C) Redesignate and Allow Claims; (D) Reduce and Allow Claims; (E) Redesignate, Reduce and Allow Claims; (F) Reclassify, Reduce and Allow Claims; and (G) Redesignate Claims) [Docket No. 5152]

Related Documents:

- a. Notice of Adjournment of Hearing on Debtors' Forty-Fourth Omnibus Objection to Claims ((A) Late-Filed Claims; (B) Duplicate Claims; (C) Redesignate and Allow Claims; (D) Reduce and Allow Claims; (E) Redesignate, Reduce and Allow Claims; (F) Reclassify, Reduce and Allow Claims; and (G) Redesignate Claims) Against ISGN Solutions, Inc. (Claim No. 5688) to December 11, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5512]
- b. Notice of Adjournment of Hearing on Debtors' Forty-Fourth Omnibus Objection to Claims ((A) Late-Filed Claims; (B) Duplicate Claims; (C) Redesignate and Allow Claims; (D) Reduce and Allow Claims; (E) Redesignate, Reduce and Allow Claims; (F) Reclassify, Reduce and Allow Claims; and (G) Redesignate Claims) Against Elevenhome Limited (Claim No. 6841) and Redwood Recovery Services, LLC (Claim No. 6842) to December 11, 2013 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5644]
- c. Notice of Adjournment of Hearings on Debtors' Twenty-Sixth, Thirtieth, Forty-Second, Forty-Fourth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6107]
- d. Notice of Adjournment of Hearing on Debtors' Forty-Fourth Omnibus Objection to Claims ((A) Late-Filed Claims; (B) Duplicate Claims; (C) Redesignate and Allow Claims; (D) Reduce and Allow Claims; (E) Redesignate, Reduce and Allow Claims; (F) Reclassify, Reduce and Allow Claims; and (G) Redesignate Claims)) Against ISGN Solution Inc. (Claim No. 5688), Elevenhome Limited (Claim No. 6841) and Redwood Recovery Services, LLC (Claim No. 6842) [Docket No. 6358]
- e. Notice of Presentment of Stipulation and Order Authorizing Withdrawal of Proofs of Claim Numbered 6841 and 6842 [Docket No. 6471]

Responses:

- a. Response of Redwood Recovery Services, LLC and Elevenhome Limited to the Debtors' Forty-Fourth Omnibus Objection to Claims [Docket No. 5348]

Status: This matter, solely as it relates to the claims filed by Elevenhome Limited and Redwood Recovery Services, LLC, has been resolved. No hearing is required.

- 5. Debtors' Forty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) [Docket No. 5161]

Related Documents:

- a. Notice of Adjournment of Hearing on Debtors' Forty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) Solely as it Relates to Certain Claimants [Docket No. 5673]
- b. Notice of Adjournment of Hearings on Debtors' Twenty-Sixth, Thirtieth, Forty-Second, Forty-Fourth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6107]
- c. Notice of Adjournment of Hearing on Debtors' Forty-Ninth and Fiftieth Omnibus Claims Objections Against Certain Claimants [Docket No. 6213]
- d. Notice of Adjournment of Hearing on Debtors' Thirtieth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6360]
- e. Notice of Adjournment of Hearing on Debtors' Forty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records), Solely as it Relates to the Claim Filed by Douglas and Irene Schmidt, to February 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6385]
- f. Notice of Adjournment of Hearing on Debtors' Thirtieth and Forty-Ninth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6476]

Responses:

- a. Response of William J. Futrell to the Objection of Futrell Claim [Docket No. 5484]
- b. Response of Irene Schmidt to Debtors' Forty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) [Docket Nos. 5505/5552]
- c. Objection by James Ladd and Anne Ladd to Debtors' Forty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims – Books and Records) [Docket Nos. 5529/5583]
- d. Response of Mary R. Biancavilla to Debtors' Forty-Ninth Omnibus Objection to Claims ("No Liability Borrower Claims – Books and Records") and Request for Enlargement of Time Limitations Specified by Notice of Filing of Exhibits 2 through 21 Compromising the Plan Supplement to the Joint Chapter 11 Plan Proposed by Residential Capital, LLC, *et al.* and the Official Committee of Unsecured Creditors, and Declaration of Mary R. Biancavilla Pursuant to Title 28 U.S.C. Section 1746 [Docket No. 5755]

Reply:

- a. Borrower Claims Trust's Reply In Support Of Debtors' Forty-Ninth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) [Docket No. 6369]

Status: The hearing on this matter, solely as it relates to the claims filed by Irene Schmidt, Mary R. Biancavilla, William J. Futrell and James and Anne Ladd, has been adjourned to March 11, 2014.

- 6. Debtors' Fiftieth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) [Docket No. 5162]

Related Documents:

- a. Notice of Adjournment of Hearing on Debtors' Fiftieth Omnibus Objection to Claims (No Liability Borrower Claims - Books and Records) Solely as it Relates to Certain Claimants to December 11, 2013 at 10:00 a.m. [Docket No. 5735]
- b. Notice of Adjournment of Hearing on Debtors' Fiftieth Omnibus Objection to Claims (No Liability Borrower Claims – Books and Records) Against Neville and Maribeth Evans (Claim Nos. 5267 and 5272) to January 9, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 5752]
- c. Notice of Adjournment of Hearings on Debtors' Twenty-Sixth, Thirtieth, Forty-Second, Forty-Fourth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6107]
- d. Notice of Adjournment of Hearings on Debtors' Thirty-Sixth, Fiftieth and Fifty-First Omnibus Objections to Claims Against Certain Claimants [Docket No. 6123]
- e. Notice of Adjournment of Hearing on Debtors' Forty-Ninth and Fiftieth Omnibus Claims Objections Against Certain Claimants [Docket No. 6213]
- f. Notice of Adjournment of Hearing on Debtors' Thirtieth, Forty-Ninth and Fiftieth Omnibus Objections to Claims with Respect to Certain Claimants [Docket No. 6360]

Responses:

- a. Response of Stewart Title Guaranty Company to Debtors' Fiftieth Omnibus Objections to Claims with Respect to Claim No. 1400 [Docket No. 5433]

Status: This matter, solely as it relates to the claim filed by Stewart Title Guaranty Company, has been resolved. No hearing is required.

7. Debtors' Fifty-Second Omnibus Objection to Claims (Insufficient Documentation) [Docket No. 6074]

Related Document(s):

- a. Notice of Adjournment of Hearing as to Certain Claims on (A) Debtors' Fifty-Second Omnibus Objections to Claims (Insufficient Documentation), and (B) Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) [Docket No. 6210]
- b. Notice of Adjournment of Hearing on Debtors' Fifty-Second Omnibus Objection to Claims (Insufficient Documentation) Solely as it Relates to the Claims Filed by UBS Real Estate Securities Inc. to February 20, 2014 at 10:00 a.m. [Docket No. 6328]
- c. Notice of Adjournment of Hearing on Debtors' Fifty-Second Omnibus Objection to Claims (Insufficient Documentation) Solely as it Relates to the Claim Filed by Deutsche Bank to March 11, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6469]
- d. Notice of Adjournment of Hearing on Debtors' Fifty-Second Omnibus Objection to Claims (Insufficient Documentation) Solely as it Relates to Claims Filed by UBS Real Estate Securities, Inc. [Docket No. 6490]

Response(s):

- a. Response of UBS Real Estate Securities Inc. to Debtors' Fifty-Second Omnibus Objection to Claims (Insufficient Documentation) [Docket No. 6470]

Status: The hearing on this matter, solely as it relates to the claims filed by Deutsche Bank, has been adjourned to March 11, 2014. The hearing on this matter, solely as it relates to the claims filed by UBS Real Estate Securities Inc., has been adjourned to March 26, 2014.

8. Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) [Docket No. 6077]

Related Document(s):

- a. Notice of Adjournment of Hearing as to Certain Claims on (A) Debtors' Fifty-Second Omnibus Objections to Claims (Insufficient Documentation), and (B) Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) [Docket No. 6210]
- b. Notice of Adjournment of Hearing Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) Solely as it Relates to

the Claims Filed by Hewlett-Packard Company to February 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6315]

- c. Notice of Adjournment of Hearing Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) Solely as it Relates to the Claims Filed by California Housing Finance Agency to February 20, 2014 at 10:00 a.m. (Prevailing Eastern Time) [Docket No. 6321]
- d. Notice of Adjournment of Hearing on Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) Solely as it Relates to the Claims Filed by Federal Home Loan Mortgage Corporation to February 20, 2014 at 10:00 a.m. [Docket No. 6323]
- e. Notice of Adjournment of Hearing on Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability - Assigned Contract Claims) Solely as it Relates to the Claims Filed by Federal Home Loan Mortgage Corporation to March 26, 2014 at 10:00 a.m. [Docket No. 6477]
- f. Notice of Adjournment of Hearing on Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability – Assigned Contract Claims) Solely as it Relates to the Claims Filed by California Housing Finance Agency to March 11, 2014 at 10:00 a.m. [Docket No. 6480]

Response(s):

- a. Opposition of California Housing Finance Agency to Debtors' Fifty-Fifth Omnibus Objection to Claims (No Liability- Assigned Contract Claims) [Docket No. 6216]

Status: The parties are finalizing a stipulation to resolve the objection as to Hewlett Packard's claims and therefore no hearing is required. The hearing on this matter, solely as it relates to the claims filed by Federal Home Loan Mortgage Corporation, has been adjourned to March 26, 2014. The hearing on this matter, solely as it relates to the claims filed by California Housing Finance Agency, has been adjourned to March 11, 2014.

V. ADVERSARY PROCEEDING MATTER(S)

Hawthorne v. GMAC Mortgage, LLC, Adv. Proc. No. 12-02050 (MG)

- 1. Status Conference

Related Document(s):

- a. Complaint to Determine Nature and Extent of Liens Pursuant to 11 U.S.C. § 506(a) [Docket No. 1]

- b. Summons and Notice of Pretrial Conference in an Adversary Proceeding [Docket No. 3]
- c. Order Extending Defendants' Deadline to Answer or Otherwise Respond to Adversary Complaint [Docket No. 4]
- d. Letter from N. Rosenbaum to Judge Glenn Requesting Extension of Time by which all Defendants Must Answer or Otherwise Respond to the Complaint [Docket No. 6]
- e. Second Order Extending Defendants' Deadline to Answer or Otherwise Respond to Adversary Complaint [Docket No. 7]
- f. Order Directing the Applicability of Borrower Adversary Proceeding Procedures [Docket No. 9]
- g. Notice of Applicability of the Order Approving Mandatory Supplemental AP Procedures for AP Actions [Docket No. 10]
- h. Defendant's Progress Report [Docket No. 12]
- i. Defendant's Progress Report [Docket No. 15]
- j. Defendant's Progress Report [Docket No. 17]
- k. Notice of Status Conference [Docket No. 19]

Status: The status conference on this matter will be going forward.

Dated: February 18, 2014
New York, New York

/s/ Norman S. Rosenbaum _____
Gary S. Lee
Lorenzo Marinuzzi
Norman S. Rosenbaum
MORRISON & FOERSTER LLP
1290 Avenue of the Americas
New York, New York 10104
Telephone: (212) 468-8000
Facsimile: (212) 468-7900

*Counsel for The Post-Effective Date
Debtors, The ResCap Liquidating Trust
and The ResCap Borrower Claims Trust*